### UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

United States of America,

Case:2:21-cr-20102

Judge: Murphy, Stephen J.

MJ: Whalen, R. Steven

Filed: 02-10-2021 At 03:04 PM

INDI USA V LEE JAMES MOUAT (LG)

Violations:18 U.S.C. § 249

D-1 LEE JAMES MOUAT,

Defendant.

v.

#### **INDICTMENT**

THE GRAND JURY CHARGES:

# **COUNT ONE**18 U.S.C. § 249 - Hate Crime

On or about June 6, 2020, in the Eastern District of Michigan, defendant LEE JAMES MOUAT willfully caused bodily injury to D.F., and attempted to cause bodily injury to D.F. through the use of a dangerous weapon (a bike lock), because of D.F.'s actual and perceived race and color.

All in violation of Title 18, United States Code, Section 249.

# **COUNT TWO 18 U.S.C. § 249 - Hate Crime**

On or about June 6, 2020, in the Eastern District of Michigan, defendant LEE JAMES MOUAT attempted to cause bodily injury to T.G. through the use of a dangerous weapon (a bike lock), because of T.G.'s actual and perceived race and color.

All in violation of Title 18, United States Code, Section 249.

THIS IS A TRUE BILL.

/s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

GREGORY B. FRIEL
Deputy Assistant Attorney General
Civil Rights Division

DAVID A. GARDEY Chief, Public Corruption Unit TARA ALLISON
Trial Attorney

/s/Frances Lee Carlson

FRANCES LEE CARLSON
Assistant United States Attorney

Dated: February 10, 2021

#### Case 2:21-cr-20102-SJM-RSW ECF No. 12, PageID.36 Filed 02/10/21 Page 3 of 3

Case:2:21-cr-20102

United States District Court Eastern District of Michigan		Judge: Murphy, Stephen J.  MJ: Whalen, R. Steven	
NOTE: It is the responsibility of the Assistant U.S. Atto	rney signing this form to comple	ined: 02-10-2021 At 03:04 PM INDI USA V LEE JAMES MOUAT (LG)	
Companion Case Information	n	Companion Case Number:	
This may be a companion case based or	LCrR 57.10(b)(4) <sup>1</sup> :		
□Yes ☑No		AUSA's Initials:	
Case Title: USA v. <u>Lee</u>	James Mouat		
County where offense occur	rred: <u>Monroe</u>	MJ: Whalen, R. Steven Filed: 02-10-2021 At 03:04 PM INDI USA V LEE JAMES MOUAT (LG)  Companion Case Number:  O(b)(4)¹:  AUSA's Initials:  Uat  Monroe  Charges  Prior Complaint (if applicable)  Frances Lee Carlson Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226 frances.carlson@usdoj.gov	
Offense Type: Felon	Criminal Case Cove  Int of Michigan  Criminal Case Cove  M.: Whalen, R. Steven Filed: 02-10-2021 At 03:04 PM INDI USA V. LEE JAMES MOUAT (LG)  Case Information  Type: Felony  Int - based upon prior complaint [Case number: 20-mj-30425]  Case No:  Judge: Murphy, Stephen J.  M.: Whalen, R. Steven Filed: 02-10-2021 At 03:04 PM INDI USA V. LEE JAMES MOUAT (LG)  Companion Case Number:  AUSA's Initials:  Where offense occurred:  Monroe  Type: Felony  Int - based upon prior complaint [Case number: 20-mj-30425]  Case No:  Judge:  Prior Complaint (if applicable)  Australia (if applicable)  Frances Lee Carlson Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226 frances.carlson@usdoj.gov		
Indictment based upon prior complaint [Case number: 20-mj-30425]			
Superseding Case Information	on a		
Superseding to Case No:		Judge:	
Reason:			
<u>Defendant Name</u>	<u>Charges</u>	Prior Complaint (if applicable)	
Please take notice that the below the above captioned case	v listed Assistant U	Inited States Attorney is the attorney of record for	
February 10, 2021		WM /	
Date			
	•	•	
		•	
		·	
		(313) 226-9696	

Bar #: P62624

<sup>&</sup>lt;sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.